

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13

**Woods, Davy**

**Woods, Angela B**

**Debtors/ Respondents : 19-11128**

**Answer to Motion of  
For Relief from Automatic Stay**

Debtors, Davy and Angela B Woods by and through their undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by FREEDOM MORTGAGE CORPORATION ("Movant"). These responses are made without prejudice to debtors' right to present additional facts or contentions at a hearing based upon information hereinafter obtained or evaluated. Debtors specifically reserve the right to supplement or amend his/her/ their responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The allegation contained herein are directed to a party other than the answering debtors, and they are denied as no response is required.

2. Admitted in Part. It is admitted that DEBTORS, DAVY WOODS AND ANGELA B WOODS A/K/A ANGELA WOODS, are the owners of the premises located at 309 ROSS COURT, WYNCOTE, PA 19095. The remaining averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

3. Denied. The averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

4. Denied. Debtors can neither admit nor deny the allegations because Debtors have no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded at trial.

5. Denied. The allegation contained herein are directed to a party other than the answering debtors, and they are denied as no response is required.

6. Denied as stated. The filing of a bankruptcy petition immediately puts into effect the automatic stay, which prevents creditors from taking any further actions against the debtor or the debtor's property with respect to claims arising prior to commencement of the case. See 11 U.S.C. Section 362. By way of further answer, the allegation contained herein are directed to a party other than the answering debtors, and they are denied as no response is required. Proof thereof is demanded.

7. Denied. Debtors can neither admit nor deny the allegations because Debtors have no personal knowledge of the accuracy of such statement. Strict proof is

hereby demanded at trial. By way of further response, the remaining averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

8. -9. Denied. The allegation is a legal conclusion of law to which no answer is required.

10. Denied. Federal Bankruptcy Rule 4001(a)(3) states "*Stay of Order. An order granting a motion for relief from an automatic stay made in accordance with Rule 4001(a)(1) is stayed until the expiration of 10 days after the entry of the order, unless the court orders otherwise.*" Rule 4001(a)(3) is one of the few protections left for the debtor's from unscrupulous creditors that would seize the debtor's property prior to the debtor or debtor's counsel being served notice of said Order to the contrary or otherwise.

11. Denied. The allegation is a legal conclusion of law to which no answer is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray that the motion be denied, and such other relief as is just and proper. The Debtors specifically reserve the right to supplement the answer at or prior to the hearing thereon.

Dated: November 6, 2019

"/s/" Mitchell J. Prince  
John L. Mc Clain, Esquire  
Mitchell J. Prince, Esquire  
Attorneys for Debtors  
P.O. Box 123  
Narberth, PA 19072  
(215) 893-9357